Index to Vol. XVII

References Show Month and Page Number

January—December, 1939

General Index

A

"Administrative and Judicial Procedure for Federal Income, Estate and Gift Taxes —A Criticism and a Proposal," by Roger J. Traynor, 4:219; 7:417
"Alleged Shifts in Constitutional Doctrines," by William Cogger, 10:573
Altman, George T.—"Mortgagors' Losses: Capital or Ordinary?", 7:387
American Bar Association, Tax Clinic of the Committee on Federal Taxation—Open Forum Proceedings, 7:390; 11:643
American Institute of Accountants, Committee on Federal Taxation—"Federal Tax Revision Program," 11:649
"Analysis of Retrospective Income Taxation, An," by J. E. Ivins, 2:76
Annual Report of the Commissioner of Internal Revenue, 2:109
"Assignment of Earned Income," by Henry M. Groves and Cecil H. Kopperman, 12:719
"Assumption of Debts in Corporate Reorganizations," by Samuel Joyce Sherman, 12:691
Austin, Maurice—"Capital Gains and Losses under the Revenue Act of 1938," 3:131
Avery, Herbert S.—"Taxation of Corporations under U. S. Income Tax Laws," 9:531

B

"*Bailey* Case," The, by M. N. Friedland, 9:512
Bashe, C. E.—"Fair Market Value of Inventory Property," 2:71
"Basis of Federal Fiscal Policy, The," by Gerhard Colm, 6:338
Basis of Stock Rights and Dividends, 12:738
Bennett, Emmett L.—"Income Tax Immunities," 8:451
Bloomenthal, Lawrence R.:
"A Survey of Tax Exemptions," 5:273
"Income Tax Aspects of Alimony Trusts," 8:455
BTA Amends Rules of Practice, 4:236
Bondurant, Keith P.—"The Windfall Tax and Processing Tax Refund Provisions of the Revenue Act of 1936," 3:160
Book Reviews—see "Current Books of Interest in the Field of Taxation"
British and American Taxes Compared, 1:39
"British Income Tax, The—Relief for Persons over 65 Years of Age," by H. Arnold Strangman, 8:469
Brown, C. C.—"The Gross Earnings Method of Taxing Freight Lines," 5:288

C

"Capital Gains and Losses Since 1922," by R. S. Jessup, 6:333
"Capital Gains and Losses under the Revenue Act of 1938," by Maurice Austin, 3:131
Capital Stock Tax Returns—Extension of Time for Filing, 8:489
Carter, Milton E.—"Decentralization of the Bureau of Internal Revenue," 7:403
"Changes in the New York State Tax Law —1938," by Leo Mattersdorf, 1:19
Citizen's Conference on Government, 5:311
Code of Federal Regulations, 8:490
Code, The New Internal Revenue, 7:444
Codification of Internal Revenue Laws, 2:107
Colm, Gerhard—"The Basis of Federal Fiscal Policy," 6:338
Committee on Federal Taxation, American Bar Association,—"Tax Clinic Proceedings," 7:390; 11:643
Committee on Federal Taxation, American Institute of Accountants—"Federal Tax Revision Program," 11:649
Conrad, Morton S.—"Some Suggestions for Changes in the Federal Income Tax," 12:713
"Contrasts in Tax Policy of Canada and the United States," by C. Fraser Elliott, 1:8
Cooper, Walter A.—"Some Economic Effects of Taxation," 10:566
"Coördination of Tax Systems," by Ralph W. Smith, 11:629
Culp, Maurice C.—"Administrative Remedies in the Assessment and Enforcement of State Taxes," 5:295
Current Books of Interest in the Field of Taxation, 1:44; 2:123; 3:189; 4:255; 5:312; 6:378; 7:442; 9:550; 12:741

D

"Decentralization of the Bureau of Internal Revenue," by Milton E. Carter, 7:403
Dibble, Frank W.—"Over-Allowances as Related to the Illinois Retailers' Occupation (Sales) Tax," 2:79
Digests of Articles on Taxation in Current Legal Periodicals, 1:27; 2:86; 3:159; 4:219; 5:292; 6:351; 7:415; 8:474; 9:527; 10:588; 11:670; 12:733
"Does 20 x $50,000 = $67,100?", by Irwin D. Herzfelder, 1:21
"Double Domicile in Inheritance Taxation," by W. H. H. Gentry, 10:576
Double Taxation of Intangibles, 7:425
Dudley, Claude W.—"Refunds of Processing Taxes under Title VII of the Revenue Act of 1936," 9:518

E

Eicholtz, Robert B.—"Should the Federal Income Tax Be Simplified?", 9:527
Eighth Tax Clinic Meets in Washington, 4:236
"Eighth Tax Clinic of the A. B. A. Committee on Federal Taxation," by George M. Morris, 7:390
Eisner, Frederick W.—"Taxation of American Investments and Business in Great Britain," 1:28
Elliott, C. Fraser—"Contrasts in Tax Policy of Canada and the United States," 1:8
Enrollment to Practice before Treasury Department, 9:540
Epstein, Bernard—"Life Insurance Policies Payable to Named Beneficiaries—Exemption from the Federal Estate Tax," 10:579
"Exemptions *in Personam*," by Claude W. Stimson, 8:453

F

"Fair Market Value of Blocks of Stock, The," by Harvey W. Peters, 1:17
"Fair Market Value of Inventory Property," by C. E. Bashe, 2:71
Fairchild, Walter—"Tax Titles in New York State," 1:29
Federa, H. Appleton:
"Inheritance Taxation after the *Green* Case," 5:267
"Multiple Domicile in Inheritance Taxation," 3:142
"Federal Estate Tax, The," by Harmon Spanner, 1:3
"Federal 'General Welfare' Bills—H. R. 11 and 2, The," by Paul Haensel, 4:207
"Federal Income Tax—Some Suggested Changes in," by Morton S. Conrad, 12:713
"Federal Subsidies to the States in Australia," by O. J. McDiarmid, 5:271
Federal Tax Calendar, 1:34; 2:92; 3:164; 4:224; 5:299; 6:358; 7:422; 8:482; 9:536; 10:594; 11:660; 12:732
"Federal Tax Revision Program," by Committee on Federal Taxation, American Institute of Accountants, 11:649
"Federal Taxation of State and Local Bonds," by Austin J. Tobin, 11:621
"Federal Taxation of State and Local Bonds," by John P. Wenchel, 3:134
"Federal Taxation of State and Municipal Bonds," by Paul Studenski, 1:5
"Federal-State Reciprocal Taxation of Income from Public Securities," by John P. Wenchel, 9:507
FitzGerald, John J.—"The Taxable Status of Term Trusts," 12:699
Friedland, M. N.—"The *Bailey* Case," 9:512
Frye, Arnold—"Taxes Collected by or in Aid of Municipalities," 11:633
Fulton, Arthur W.—"The Taxation of Life Insurance Premiums," 10:583

G

Gentry, W. H. H.—"Double Domicile in Inheritance Taxation," 10:576
Gluick, Lewis—"Talking Shop," 1:23; 2:83; 3:157; 4:215; 5:289; 6:348; 7:412; 8:471; 9:524; 10:585; 11,655; 12:726
"Government and Business," by John W. Hanes, 5:269
"Government-Owned Corporations and Intergovernmental Tax Immunity," by Walter Freedman, 2:86
"Gross Earnings Method of Taxing Freight Lines, The," by C. C. Brown, 5:288
Groves, Henry M., and Cecil H. Kopperman—"Assignment of Earned Income," 12:719

H

Haensel, Paul—"The Federal 'General Welfare' Bills—H. R. 11 and 2," 4:207
Hamburg, Alex M.—"Valuation of Real Property for Taxation," 3:139
Hanes, John W.—"Government and Business," 5:269
Harrow, Benjamin—"The New York Estate Tax—Some Accounting Problems," 5:279
Harvey, Paul—"Some Indicia of Capital Transactions under the Federal Income Tax Laws," 6:352

Hatcher, R. H.—"Proper Execution of Ownership Certificates," 7:405
Hayes, Adolph R.—"Legality of the Apportionment Formula as Applied in State Taxation of Net Income," 8:478
Herzfelder, Irwin D.—"Does 20 x $50,000 = $67,100?", 1:21
Hohlt, Wilbert J.—"Improvements by a Tenant as Realized Income to the Landlord," 10:590
Hogg, Robert L.—"Taxation of Life Insurance Companies under State Laws," 2:73; 3:147
Holmes, J. Hendren—"Termination of Reciprocal Tax Exemption," 4:195; 5:281
Hunter, Merlin H.—"Problems in State Taxation," 6:343

I

"Improvements by a Tenant as Realized Income to the Landlord," by Wilbert J. Hohlt, 10:590
"Income Tax Aspects of Alimony Trusts," by Lawrence R. Bloomenthal, 8:455
"Income Tax Immunities," by Emmett L. Bennett, 8:451
"Income Tax Reciprocity with Canada," by Eldon P. King, 4:205
"Income Tax Reduction: A New Approach," by Ralph R. Neuhoff, 2:67
"Increases in the British Income Tax," by H. Arnold Strangman, 1:13
"Independent Contractors—Status under the Payroll-Tax Laws," by William Margulies, 8:464
"Indian Gifts," by Robert W. Wales, 10:589
Industry's Tax Burden, 5:311
"Inheritance Taxation after the *Green* Case," by H. Appleton Federa, 5:267
"Inheritance Taxation and Powers of Appointment," by John F. Thompson, 7:415
Inspection of Returns—Regulations Revised to Include 1938 Act, 1:39
Internal Revenue Code, 4:237; 7:444
Interpretations, 1:56; 2:126; 3:191; 4:262; 5:325; 6:380; 7:445; 8:500; 9:556; 10:615; 11:682; 12:743
"Interstate Comity and Governmental Claims," by F. Arnold Baum, 1:30
Inventories under the 1939 Act, 12:737
Investigation of Income Tax Regulations, 9:541
Ivins, J. E.—"An Analysis of Retrospective Income Taxation," 2:76

J

Jackson, John J.—"Major Tax Problems of Industry," 4:203
James, Albert E.—"The Virtues of Simplicity with Special Reference to Revenue Acts," 11:619
Janin, Harry—"The New Provisions of the Federal Unemployment Tax," 10:563
Jessup, R. S.—"Capital Gains and Losses Since 1922," 6:333
Jurisdictional Aspects of State Income Taxation," by L. M. McBride, 4:197

K

Kalijarvi, Thorsten V.—"Taxation and the Common Man," 12:711
Kaplan, Alfred:
"Tax Disadvantages of Individuals and Partnerships," 4:213
"Tax-Exempt Reorganizations—Status after the *Hendler* Case," 9:523
Kendrick, M. Slade—"The Undistributed Profits Tax of 1936 and Equity," 4:200
Kent, Arthur H.:
"Mitigation of the Statute of Limitations," 5:292
"Reciprocal Taxation by Federal and State Governments of Salaries and Income from Securities," 11:625
"Kentucky Court of Appeals Holds State Chain Store Tax Unconstitutional," by James W. Martin, 6:311
King, Eldon P.—"Income Tax Reciprocity with Canada," 4:205
Kopperman, Cecil H., and Henry M. Groves—"Assignment of Earned Income," 12:719
Kuhn, Harold A.—"Simplification of Forms for Individual Income Tax Returns," 7:410

L

"Legal Aspects of Tax-Exempt Privileges," by John P. Wenchel, 6:351
"Legality of the Apportionment Formula as Applied in State Taxation of Net Income," by Adolph R. Hayes, 8:478
Legislation—see "Pending State Tax Legislation"
Lewis, H. H. Walker—"The Taxation of Ground Rents in Maryland," 10:590
"License Taxation," by Hayes A. Richardson, 8:475
"License Taxation in the Maryland Revenue System," by Hayes A. Richardson, 4:210; 5:284
"Life Insurance and the Federal Estate Tax," by Randolph E. Paul, 8:474
"Life Insurance Policies Payable to Named Beneficiaries," by Bernard Epstein, 10:579
Lockhart, William B.—"The Sales Tax in Interstate Commerce," 5:294
"Losses Resulting from Stock Becoming Worthless—Deductibility under Federal Income Tax Laws," by Joseph B. Lynch, 8:477
Lowndes, Charles L. B.—"Taxation and the Supreme Court—1937 Term," 1:27; 2:87
Lowrimore, Charles S.:
"Taxation of Unrealized Income," 1:10
"Trust Income—Test of Grantor's Taxability," 9:521
Lynch, Joseph B.—"Losses Resulting from Stock Becoming Worthless—Deductibility under Federal Income Tax Laws," 8:477

M

"Major Tax Problems of Industry," by John J. Jackson, 4:203
Margulies, William—"Independent Contractors—Status under the Payroll-Tax Laws," 8:464
Martin, James W.:
"Kentucky Court of Appeals Holds State Chain Store Tax Unconstitutional," 5:311
"Reciprocal Interchange of Confidential Data between States," 6:377
"Returns to Academic Post," 8:470
"Stable Tax Policy and Accounting Control of Profits," 7:407
"Unit Method of Railroad Assessment," 3:155
Mattersdorf, Leo—"Changes in the New York State Tax Law—1938," 1:19
McBride, L. M.—"Jurisdictional Aspects of State Income Taxation," 4:197
McDiarmid, O. J.—"Federal Subsidies to the States in Australia," 5:271
Miller, Robert N.—"Taxation of Intercorporate Dividends," 3:150
"Million-Dollar Incomes," 6:364
"Mitigation of the Statute of Limitations," by Arthur H. Kent, 5:292
Monarch, J. Louis—"The Projected New Rules for Appeals from the BTA and the Processing Tax Board of Review," 7:399
Morris, George M.:
"Eighth Tax Clinic of the A. B. A. Committee on Federal Taxation," 7:390
"Ninth Tax Clinic, etc.," 11:643
"Mortgagors' Losses: Capital or Ordinary?", by George T. Altman, 7:387
"Multiple Domicile in Inheritance Taxation," by H. Appleton Federa, 3:142
Multiple State Death Taxes on Transfer of Intangibles, 8:489
"Multi-State Taxation of Interstate Sales," by George M. Johnson, 10:588

N

National Tax Conference, 5:310; 10:614
Nelson, Godfrey N.—"War-Profit Taxes and Their Records," 10:569
Neuhoff, Ralph R.—"Income Tax Reduction: A New Approach," 2:67
New Capital Stock Tax Regulations, 3:167
New Income Tax Regulations, 3:167
New Internal Revenue Code, The, 7:444
"New Provisions of the Federal Unemployment Tax, The," by Harry Janin, 10:563
New Regulations 102, 5:310
"New York Estate Tax, The—Some Accounting Problems," by Benjamin Harrow, 5:279
"New York State Tax on Unincorporated Business, The," by Julius H. Rauh, 6:345
Newcomer, Mabel—"State Tariff Walls," 9:509
North Carolina Public Debt, 8:497

O

Oklahoma's New Community Property Law, 8:482
Open Forum Proceedings, Tax Clinics of A. B. A. Committee on Federal Taxation, 7:390; 11:643
Outlook for Federal Tax Legislation, 1:40
"Over-Allowances as Related to the Illinois Retailers' Occupation (Sales) Tax," by Frank W. Dibble, 2:79
Overlapping Taxing Units in Illinois, 10:610

P

Paul, Randolph E.:
"Federal Income Tax Problems of Mortgagors and Mortgagees," 9:530
"Life Insurance and the Federal Estate Tax," 8:474
Pending State Tax Legislation, 1:35; 2:94; 3:175; 4:227; 5:301; 6:371; 7:433; 8:483; 9:547; 10:595; 12:734
Peters, Harvey W.—"The Fair Market Value of Blocks of Stock," 1:17
Pierce, Dixwell L.—"The Use by State Authorities of Federal Income Tax Returns," 11:637
"Powers of Appointment and the Federal Income Tax," by Erwin N. Griswold, 7:416
Practice before Treasury Department—Regulations Amended, 8:491
Prettyman, E. Barrett—"The Traynor Proposals—Some Considerations," 7:397
"Private Pension Plans and the Revenue Act," by Albert Handy, 8:476
"Problems in State Taxation," by Merlin H. Hunter, 6:343
"Processing Taxes under Title VII of the Revenue Act of 1936, Refunds of," by Claude W. Dudley, 9:518
"Projected New Rules for Appeals from the BTA and the Processing Tax Board of Review, The," by J. Louis Monarch, 7:399
"Proper Execution of Ownership Certificates," by R. H. Hatcher, 7:405
"Proposed Administrative Court Review of BTA Decisions," by J. E. Sebree, 7:401
Public Salary Tax Act of 1939, 5:309
Pugh, Joseph J.—"Some Tax Considerations in the Preparation of Wills and Deeds," 6:335

R

Railroad Taxes Paid in 1938, 12:739
"Recent Rulings and Decisions on the Taxation of Estates and Gifts," by Carl L. Bumiller, 9:529
Reciprocal Enforcement of Domiciliary Inheritance Tax in Nonresident Estates, 9:543
"Reciprocal Interchange of Confidential Data between States," by James W. Martin, 6:377
"Reciprocal Taxation by Federal and State Governments of Salaries and Income from Securities," by Arthur H. Kent, 11:625
Reciprocal Taxation of Salaries and Interest on Securities, 4:237
"Refunds of Processing Taxes under Title VII of the Revenue Act of 1936," by Claude W. Dudley, 9:518
"Regulatory Taxes," by William J. Shultz, 9:515
"Relation of Executors and Administrators to State and Federal Inheritance Taxes," by G. Aaron Youngquist, 1:15
"Relation of Rate and Tax Values of Public Utilities," by C. Emery Troxel, 5:276
Reorganization Act of 1939, 6:365
Revenue Bill of 1939, 7:427
Rice, George W.—"Tax-Exempt Bonds—Shall We Remove the Exemptions?", 2:69
Richardson, Hayes A.:
"License Taxation," 8:475
"License Taxation in the Maryland Revenue System," 4:210; 5:284

S

"Sales Tax in Interstate Commerce, The," by William B. Lockhart, 5:294
Sebree, J. E.—"Proposed Administrative Court Review of BTA Decisions," 7:401
"Section 820 of the Revenue Act of 1938," by J. S. Seidman, 6:341
Seidman, J. S.—"Section 820 of the Revenue Act of 1938," 6:341
Sherman, Samuel Joyce—"Assumption of Debts in Corporate Reorganizations," 12:691
"Should the Federal Income Tax Be Simplified?", by Robert B. Eicholtz, 9:527
Shultz, William J.:
"Regulatory Taxes," 9:515
"Tax Exemption of Governmental Securities," 6:331
Simpler Income Tax Forms for Corporations, 2:107
"Simplification of Forms for Individual Income Tax Returns," by Harold A. Kuhn, 7:410
"Single v. Multiple Trusts," by Edward P. Tremper, Jr., 8:463
Smith, Ralph W.—"Coördination of Tax Systems," 11:629
Social Security Finances, 2:108
"Some Economic Effects of Taxation," by Walter A. Cooper, 10:566
"Some Statistical 'Boondoggling,'" by Lent D. Upson and Leo Day Woodworth, 8:458
"Some Suggestions for Changes in the Federal Income Tax," by Morton S. Conrad, 12:713
"Some Tax Considerations in the Preparation of Wills and Deeds," by Joseph J. Pugh, 6:335
Spanner, Harmon—"The Federal Estate Tax," 1:3
Sparlin, Estal E.—"State Supervision of Local Property Tax Assessments," 8:467
"Stable Tax Policy and Accounting Control of Profits," by James W. Martin, 7:407
"State Gift Tax Jurisdiction," by Edward N. Cahn, 5:296
"State Supervision of Local Property Tax Assessments," by Estal E. Sparlin, 8:467
"State Tariff Walls," by Mabel Newcomer, 9:509
State Tax Calendar, 1:31; 2:89; 3:161; 4:221; 5:297; 6:355; 7:419; 8:479; 9:533; 10:591; 11:657; 12:729
"Status of Independent Contractors under the Payroll-Tax Laws," by William Margulies, 8:464
Stimson, Claude W.—"Exemptions *in Personam*," 8:453
Stock Rights and Dividends, Basis, 12:738
Strangman, H. Arnold:
"Increases in the British Income Tax," 1:13
"The British Income Tax—Relief Provisions for Persons over 65 Years of Age," 8:469
Studenski, Paul—"Federal Taxation of State and Municipal Bonds," 1:5
Surrey, Stanley S.—"The Traynor Plan—What It Is," 7:393
"Survey of Social Security, A," by I. A. Voltz, 3:152
"Survey of Tax Exemptions, A," by Lawrence R. Bloomenthal, 5:273
"Sweden, A Tax Agreement with," by Harold Wurzel, 8:460

T

Talking Shop with Lewis Gluick, 1:23; 2:83; 3:157; 4:215; 5:289; 6:348; 7:412; 8:471; 9:524; 10:585; 11:655; 12:726
"Tax Agreement with Sweden, A," by Harold Wurzel, 8:460
Tax Clinic of the Committee on Federal Taxation, American Bar Association—Open Forum Proceedings, 7:390; 11:643
Tax Convention with France, 9:542
Tax Convention with Sweden, 5:310; 8:460
"Tax Disadvantages of Individuals and Partnerships," by Alfred Kaplan, 4:213
"Tax Exemption of Governmental Securities," by William J. Shultz, 6:331
"Tax on Life Insurance Premiums, The," by Arthur W. Fulton, 10:583
"Taxable Status of Term Trusts, The," by John J. FitzGerald, 12:699
"Taxation and the Common Man," by Thorsten V. Kalijarvi, 12:711
"Taxation and the Supreme Court—1937 Term," by Charles L. B. Lowndes, 1:27; 2:87
"Taxation of American Investments and Business in Great Britain," by Frederick W. Eisner, 1:28
"Taxation of Corporations under U. S. Income Tax Laws," by Herbert S. Avery, 9:531
"Taxation of Government Corporations Engaged in Business within the States," by William C. Walsh, 10:570
"Taxation of Intercorporate Dividends," by Robert N. Miller, 3:150
Taxation of Judges' Salaries, 7:422
"Taxation of Life Insurance Companies under State Laws," by Robert L. Hogg, 2:73, 3:147
"Taxation of Unrealized Income," by Charles S. Lowrimore, 1:10
"Tax-Exempt Bonds—Shall We Remove the Exemption?", by George W. Rice, 2:69
"Tax-Exempt Reorganizations—Status after the *Hendler* Case," by Alfred Kaplan, 9:523
"Taxes Collected by or in Aid of Municipalities," by Arnold Frye, 11:633
"Termination of Reciprocal Tax Exemption," by J. Hendren Holmes, 4:195; 5:281
Thompson, John F.—"Inheritance Taxation and Powers of Appointment," 7:415
Tobin, Austin J.—"Federal Taxation of State and Local Bonds," 11:621
"Traynor Plan, The—What It Is," by Stanley S. Surrey, 7:393
"Traynor Proposals, The—Some Considerations," by E. Barrett Prettyman, 7:397
Traynor, Roger J.—"Administrative and Judicial Procedure for Federal Income, Estate and Gift Taxes—A Criticism and a Proposal," 4:219; 7:417
Tremper, Edward P., Jr.—"Single v. Multiple Trusts," 8:463
Troxel, C. Emery—"Relation of Rate and Tax Values of Public Utilities," 5:276
"Trust Income—Test of Grantor's Taxability," by Charles S. Lowrimore, 9:521

U

"Undistributed Profits Tax of 1936 and Equity, The," by M. Slade Kendrick, 4:200
"Unit Method of Railroad Assessment," by James W. Martin, 3:155
U. S. Taxes Low Compared to Other Countries, 3:168
Upson, Lent D. and Leo Day Woodworth—"Some Statistical 'Boondoggling'," 8:458
"Use by State Authorities of Federal Income Tax Returns, The," by Dixwell L. Pierce, 11:637

V

"Valuation of Real Property for Taxation," by Alex M. Hamburg, 3:139
Vinson Act, The:
Amended, 6:370
Closing Agreements, 12:738
New Regulations, 9:546
"Virtues of Simplicity with Special Reference to Revenue Acts," by Albert E. James, 11:619
Voltz, I. A.—"A Survey of Social Security," 3:152

W

Wales, Robert W.—"'Indian' Gifts," 10:589
Walsh, William C.—"Taxation of Government Corporations Engaged in Business within the States," 10:570
"War-Profit Taxes and Their Records," by Godfrey N. Nelson, 10:569
Washington Tax Talk, 1:37; 2:107; 3:167; 4:235; 5:309; 6:363; 7:425; 8:489; 9:541; 10:601; 11:671; 12:737
Wenchel, John P.:
"Federal Taxation of State and Local Bonds," 3:134
"Federal-State Reciprocal Taxation of Income from Public Securities," 9:507
"Legal Aspects of Tax-Exempt Privileges," 6:351
"What's going on in the Chief Counsel's Office," 11:641
Will "Government Investment" Promote Recovery?, 4:235
"Windfall Tax and Processing Tax Refund Provisions of the Revenue Act of 1936, The," by Keith P. Bondurant, 3:160
Windfall Tax Regulations Amended, 9:540
Woodworth, Leo Day and Lent D. Upson—"Some Statistical 'Boondoggling'," 8:458
Wurzel, Harold—"A Tax Agreement with Sweden," 8:460

Y

Youngquist, G. Aaron—"Relation of Executors and Administrators to State and Federal Inheritance Taxes," 1:15

Interpretations

U. S. Supreme Court

A

Accrual Date, 10:616

B

Bond Retirement, Capital Gains, Prior Law, 5:325
Business and Occupation Tax, 4:262
  Measured by Gross Income, 4:262
  Motion Picture Distributors, 4:262

C

Capital Loss, 1:56
Casualty Losses, Nonbusiness Company, Amount Deductible, 2:126
Compromise in Will, Taxability of Payment, 1:56
Contributions, Limitation on Deduction, 2:126
Corporation Dealing in Own Stock, 3:191

D

Death Taxes, Domicile, 7:445
Deductions, Tax on Bank Shares, 10:616
Depletion
  1928 and 1932 Acts, Net Income, 12:743
Dividends Paid Credit, 10:616

E

Estate Tax
  Joint Tenancy, 4:262
  War Risk Insurance, Includibility in Gross Estate, 6:380
Exemptions, Social Clubs, 10:616

G

Gift Tax
  Transfers in Trust, Grantors Reserving Right to Change Beneficiaries, 12:743
Gross Income
  Exclusions, 10:616
  Inclusions, 10:616

I

Intergovernmental Taxation, Public Salaries, 5:325
Interstate Telephone and Telegraph Company, Rights of Retention and Installment, 4:262

J

Judge's Salary, Taxability, 6:380
Jurisdiction
  District Court, 4:262
  Domiciliary State, 7:445

L

Lessee's Improvements, No Income to Lessor, 1:56
Liquidation Loss, 1:56

M

Motor Carrier Taxes, Constitutionality, 4:262
Motor Vehicle Caravan Act, Due Process, 6:380

N

National Firearms Act, Constitutionality, 6:380

R

Redemption of Bonds, Unamortized Bond Discount of Merged Subsidiary, 5:325

S

Social Security Act, Employees, 10:616
State Tax
  Dividends, 4:262
  Federal Salaries, Constitutionality, 5:325

T

Transferee, Limitation Period under 1926 Act, 2:126
Trust Income, Liability for State Taxes, 4:263

U

Use Tax, 4:263

Appellate and Lower Courts

A

AAA Compensating Taxes
  Jurisdiction of Customs Court, 10:615
  Recovery, 10:615
AAA Processing Taxes
  Action to Recover, 10:615
  Claim for Refund, 10:615
  Jurisdiction of Board, 10:615
  Parties, 10:615
  Recovery, 1:56
Accounting Methods, 5:325
Admissions Taxes, 3:191
Affiliated Corporations, Assessment against Wrong Member—Effect, 2:126
Association, Taxability as Corporation, 2:126

B

Bad Debts, 1:56; 3:191; 5:325
  Ascertainment of Worthlessness, 5:325
  Deduction, 10:615
  Charge-off, 12:743
  Endorsement Liability Satisfied with Realty, 10:615
  Loss, 4:263
  Mortgage Foreclosure, 3:191
  Worthless Stock, 1:56; 10:615
Basis of Property
  Acquired in Reorganization, 12:743
  Transmitted at Death, 2:126
Business Expense, Deductibility, 3:191

C

Cancellation of Stockholders' Withdrawals, 1:56
Capital v. Income, 5:326
Capital v. Ordinary Loss, 11:684
Capital Loss, Conveyance of Property for Cancellation of Notes, 6:380
Capital Stock Tax, 3:191; 5:326; 7:445
  Adjustment to Declared Net Value, 5:326
  Amendment of Declared Value, 11:684
  Association v. Partnership, 5:326
  Constitutionality, 5:326
  Doing Business, 1:57; 3:191; 7:445; 11:684
  Mortgage Loans and Title Insurance, 2:126
Cemetery Maintenance Fund, Deductibility, 7:445
China Trade Act Corporation, Special Dividend Distribution, 7:445
Claim for Refund, Timeliness, 1:57
Community Property
  Agreement as to Property Rights, 12:744
  Dividends, 3:191
  Income, Evidence, 12:744
Compensation for Services, Reasonableness, 3:191; 12:744
Compromise Payment, Recovery, 1:57
Corporations
  Dealing in Own Stock, 8:500
  Non-exempt as Social Club, 8:500

D

Deductions
  Business Expense, Rent Guaranty, 12:744
  Charitable Contributions, 11:684
  Inheritance Tax, 11:685
Depletion
  Allowance Denied, 2:127
  Reserve, Distributions, 8:500
Depreciated Stock, Exchange, 11:684
Distraint, Assigned Property, 7:446
Dividend Tax under NIRA, 7:446
Donor's Taxes, Donee's Liability, 2:127
Dues and Initiation Fees Taxes, Bankruptcy, Priority, 2:127

E

Educational Organizations, Denial of Exemptions, 1:57
Estate Tax
  Charitable Bequests, 7:446
  Claims, 8:500
  Close Corporation Stock—Value, 2:127
  Contemplation of Death, 1:57, 5:326
  Contingent Interest in Realty, 8:500
  Deductibility, 11:684
  Gross Estate, 1:57; 12:744
  Indians—Limitation on Suits, 8:500
  Insurance Proceeds, 7:446
  Interest on Deposit in Excess of Tax Due, 12:744
  Non-deductibility by Beneficiary, 1:57
  Property Passing under Power of Appointment, 8:500
  Revocable Trust, 1:57
  Stock under Option, 1:57
  Stock Valuation, 9:556
  Transfer in 1923 Excluded from Gross Estate, 9:556
Excise Tax, 5:326
  Automobile Parts, 7:446
  Claim for Refund, 2:127, 5:326
  Gasoline and Lubricating Oils, 6:380
  Toilet Preparations, 9:556
Exemptions
  Corporation, Claims, 5:326
  Interest, Municipal Notes, 7:446
  State Bond Interest, 7:446

F

Funds Seized by U. S., Assignee's Rights, 8:500

G

Gain or Loss, Offsets, 8:501
Gift Tax, 8:500
  Date of Gift, 2:127
  Exclusions, 8:500
  Insurance Policy, Premiums Paid from Community Property, 9:556
Gross Estate, Insurance, 9:556

H

Husband and Wife, 4:263
  Dividends, 4:263
  Husband's Taxability, 4:263
  Joint Tenancy Survivor Not Liable for Income Tax Deficiency of Co-Tenant Husband, 4:263
  Transactions, Loss, 9:556

I

Improper Accumulation of Surplus, 8:501
Income, 5:327
Inheritance Tax Deduction, Income from Royalties, 5:327
Installment Obligations, 5:327
Insurance
  Payments, Beneficiary's Taxability, 1:57
  Proceeds, Taxability, 8:501
Interest
  Deductions, 4:263
  Distinguished from Dividends, 9:556

L

Lessee's Improvements, Income to Lessor, 7:446
Loss, 5:327
  Bad Debts, 4:263
  Insurance Policies—Insolvent Company, 1:57

Loss—continued
Nature of Transaction, 1:57
Sale to Controlled Corporation, 1928 Act, 5:327
Stock Sales—Whether Gift, 9:559
Trade, Business or Profit Transactions, 5:327
Year of Deductibility, 4:263; 6:380

N

Newspaper Accounting, Deductions, 7:446
Nontaxable Organization, Water Plant Transferred for Municipal Bonds in 1929, 4:263

O

Obsolescence, Title Insurance Plant, 6:381
Officers' Salaries, Deduction, 8:501
Option Payments, 1:58
Overpayments
Recovery, 1:58
Timeliness of Petition to Board, 6:381

P

Partnership
Contribution, Gain, 6:381
Temporary, Taxability as Association, 9:559
Payment of Tax, Priority, 1:58
Pension, Taxability, 8:501
Personal v. Business Expense, 1:58
Personal Holding Company, 1934 Act, 7:447
Personal Property Acquired as Bequest, 6:381
Priority of Taxes, Government, 1:58

R

Railroads, Consolidated Returns for 1920, 6:381
Real Estate Taxes, Accrual, 10:615
Records, Re-examination, 1:58
Recovery after Claim in Abatement Filed, 6:381
Refund Claim
Grounds, 6:381
Insurance Company, Timeliness, 7:445
Refund of Illegal Bonus Payments, 6:381
Reorganization
Dividends, 1:58; 7:447
Gain—Year Taxable, 9:558
1928 Act, 1:58; 7:447; 9:558
Plan, 9:558
Sec. 77B, Bankruptcy Act, 1:58
Stock Exchange for Stock and Cash, 9:558
Stock Sale by Sole Stockholder, 9:558
Repealed Dividend Taxes under NIRA, 1:58
Burden of Proof as to Source of Payment, 7:447
Res Judicata, Effect of Board's Prior Decision, 7:447
Returns, Failure to File, 1:58

S

Salaries v. Dividends, 9:558
Sale of Stock, 1:58; 1:59
Non-Taxable, 6:381
Proceeds—Taxability, 1:58
Purported—Fraud, 1:59
Stamp Tax
Bond Issues, 1:59
Bond Transfers, 9:558
Certificates of Insolvent Banks, 9:558
Foreign Insurance Policies, 9:558
Par or No Par Value Stock, 9:558
Produce Futures, 9:558
Stock Issues, 9:558
Stock Transfers, 1:59, 9:558; 9:559
Voting Trusts, 9:559
Statute of Limitations
Waivers, 9:559
Statutory Period
Taxes Paid by Another after Expiration, 9:559
Stock Sales
Loss, 9:559
Transferee's Liability, 9:559
Whether Sale or Gift, 9:559
Suits against U. S., Defenses, 5:327

T

Trading Stamps—Adjustment for Redemption, 1:59
Transferee's Liability, 1:59; 5:327
Sale of Stock, 9:559
Sec. 280, 1926 Act, 1:59
Trust v. Agency, 8:501
Trust Income
Assignor's Taxability, 8:501
Bad Debt—Compromise Settlement, 1:59
Distributable—Beneficiary, 8:501
Grantor's Taxability, 8:502
Taxability, 5:327

W

Worthless Stock
Bank, 5:327
Net Loss in 1928, 5:328
Year Deductible, 7:447

Board of Tax Appeals

A

Accounting Methods
Building and Loan Shares, 11:685
Amounts Received for Stock and Agreements Not to Compete, 2:127; 3:191
Assigned Income, Taxability to Assignor, 2:127
Associations
Distributors of Oil Lease Proceeds, 9:559
Oil Lease Development, Whether Taxable as Corporation, 9:560
v. Tenancy in Common, 7:447; 9:559

B

Bad Debts
Ascertainment of Worthlessness, 7:447; 8:502
Charge-off v. Reserve System, 5:328
Deduction Disallowed, 5:328
Worthless Notes and Stocks, 5:328; 11:685
Year of Deductibility, 8:502
Basis of Corporate Assets, 5:328
Bonds, Coupons Given Away before Maturity, 9:559
Business Expense, 5:328
Credit for Dependents—Religious Contributions—Traveling Salesmen, 1:59

C

Capital Loss
1934 Act—Property Conveyed for Release from Mortgage Indebtedness, 9:559; 12:744
v. Ordinary Loss, 8:502
Surrender of Land Contract Interest, 8:502
Change of Beneficiary—Reservation of Power—Grantor's Taxability, 3:192
Community Income, Change of Domicile, 12:744
Compensation
Professional Services—When Income, 9:559
Consolidated Return in 1932, Right to New Election of Filing Separate Returns in 1933, 3:192
Corporate Expenses, Payment by Shareholder, 2:127
Corporate Liquidation, 3:192
Credit for Foreign Taxes, Computation, 8:502; 12:745

D

Deductions
Actress' Costumes, 6:382
Attorney's Fees Paid by Minor's Guardian, 2:127
Bad Debts or Worthless Stock, 1:59
Denied, Whether Business Expense, 2:128
Expenses—Singer, 6:382
Property in Another's Name, 6:382
Depletion
Bonus, Treatment Where Lease Terminated and Oil Not Extracted, 8:502
Estimate of Recoverable Reserves, 4:263
Dividends, Constructive Receipt, 8:502

E

Estate Tax
Claims, 12:745
Contemplation of Death, 1:59; 3:192; 4:263
Decedent's Property—Stock Valuation, 8:503
Gift, 4:263
Gross Estate, 1:59
Indebtedness to Brokers, 1:59
Insurance Proceeds—California Decedent, 8:503
Mortgage Valuation—Deductions and Credits, 8:503
No Testamentary Disposition, 1:59
Trust Property Not Part of Gross Estate, 1:59
Estates
Capital Net Loss Non-deductible by Beneficiary, 8:503
Mortgage Valuation—Deductions and Credits, 8:503
Excess Profits Tax—No Liability Where There Is No Capital Stock Tax, 1:60
Expenses Incurred in Protection of Investment, Trust Income—To Whom Taxable, 1:60

F

FDIC Payment—Interest Earned on Savings Account—When Deductible by Bank, 1:60
"First-in, First-out" Rule, 11:685

G

Gain, Condemnation Award, 9:560
Gift Tax
Life Insurance Policies Assigned in Trust for Husband—Whether Community State, 1:60
Transfers in Trust, 8:503
Valuation of Insurance Proceeds, 8:503

H

Husband and Wife, Trust Created by Prenuptial Agreement, 4:264
Husband's Interest Payments on Wife's Note—Deductibility, 1:60

I

Income
Computation, Revenue Agent v. Taxpayer, 12:745
Oil Payment Contracts, 1:60
Refunded Federal Estate Taxes, Annuities, 8:503
Tax Deficiency, Excess Profits Tax Overassessment, 3:192
Trust Created for Fixed Period, Not Taxable to Grantor, 1:60
Insurance Commissions, Assignment, 8:503
Insurance Company, Payments to Holders of Special Fund Certificates—Tax Status, 1:60
Interest
Constructive Receipt, 8:503
Expense, 1:61
Life Insurance Loans, 8:503
No Bona Fide Obligation, 1:61
On Dividends, 9:560
On Non-maturing Debentures—Deductibility, 9:560

J

Joint Returns, 1:61

L

Lessee's Improvements
Income to Lessor, 6:382; 9:560
Not Income to Lessor, 9:560
Life Insurance Company, Reserve Fund Required by Law, 6:382
Liquidation
Distribution Alleged but Not Made, 6:382
Indebtedness, Resultant Income Where Debtor Insolvent, 3:192
Sale, 6:382
Loans, Payment with Stock, 9:560
Long-Term Contracts, Change in Accounting Basis, 1:61
Losses, 1:61; 3:192; 12:745
Exchange of Property, 1:61
Ordinary v. Capital, 12:745; 12:746
Racing Farm, 3:192
Real Estate—Voluntary Default of Mortgage, 9:560

O

Obsolescence, Deduction Denied, 1:61
Oil Leases
Development as Association, 6:382
Development by Agent—Whether Association Taxable as Compensation, 9:560
Overpayments
Amendment to Petition Inoperative—Refund Limitation, 6:382
Amendment to Petition Proper, 4:264

P

Partnerships
Dissolution—No Recognizable Gain or Loss, 6:383
Distributive Shares, 8:503
Penalty for Unreasonable Accumulation of Surplus, 1:61
Personal Holding Company, Stock Ownership, 7:448
Pro Rata Share of Syndicate Note, Deductibility, 1:61
Profits Tax under Sec. 328, 1921 Act, 1:62

R

Real Estate Trust, 6:383
Non-taxability as Association, 6:383
Refund of Import Duties—Taxability, 7:448
Reorganization
Recapitalization—Basis, 6:383
Stock Worthlessness Determined, 1:62
Taxability of Distributions, 8:504
Revocable Trusts, Grantor's Taxability, 1:62

S

Sale of Stock—Capital Gain or Liquidation, 8:504
Severance Damages—Loss of Riparian Rights, 1:62
Shares of Stock, Identification after Reorganization, 8:504
Short Sale—Dividends, 1:62
Sole Stockholder, Sec. 104, 1928 Act, 1:62
State Obligations, Exempt Interest—California Subdivision Bonds, 1:62
Stock, 1:63
Loss Limitation under 1932 Act, 6:383
Option to Purchase, Whether Compensation, 10:616
Purchase or Compensation, 6:383
"Wash Sale," 1:62; 1:63
Subsidiary Wholly Owned, Penalty under Sec. 104, 1928 Act, 1:63
Subsistence Allowance, Additional Compensation, 6:383
Surrender of Bank Stock for Cancellation and Resale, 1:63
Surtax on Undistributed Profits, 1:63
Syndicate, Taxability as Corporation, 6:383

T

Transferee's Liability, 1:63
Transfers of Stock, Basis, 11:685
Trust Created for Fixed Period, 1:63
Trust Estate, Annuities, 1:64
Trust Income
Beneficiary's Nontaxability, 10:616
Control Retained, 6:384
Grantor's Taxability, 2:128; 6:384; 8:504; 10:616; 12:746
Irrevocable Assignment, 10:616
Power to Revest, 10:616
Settlor's Taxability, 10:616
Substantial adverse interest, 10:616
Trusteeship a Business, 1:64
Trusts—Distributable Income, 1:64

U

Unreasonable Accumulation of Surplus, Penalty, 1:61

W

Withholding at Source, 1:64
Payment to Foreign Broadcasting Company, 2:128
Worthless Stock, 1:64; 2:128; 6:384; 7:448

Bureau of Internal Revenue

A

Annuities and Insurance Policies, 8:504

B

Building and Loan Association, Exemption, 1:64
Business Expenses, 8:504
Treatment for Federal Income Tax Purposes of Carrying Charges on Whiskey in Bond, 2:128

C

Capital Gains and Losses, 3:192
Capital Stock Tax, 4:264; 7:448
Reorganization under Sec. 77B, 7:448
Carriers' Taxing Act of 1937, Compensation, 3:192; 8:504
Compensation
Injuries or Sickness, 7:448
"Overtime," Taxability, 4:264
Consent Dividends Credit, 4:264
Credits against Net Income, 12:746
Corporations, Net Operating Loss for Preceding Year, 8:504
Dividends Paid, 5:328

D

Deductions from Gross Income, 1:64
Accrual Date for State Taxes, 6:384
Bank Share Tax, 10:616
Business Expenses, 5:328; 11:685
Disallowance for Unpaid Expenses and Interest, 2:128
Interest, 4:264
Period for Which Taken, 4:264
Shrinkage in Value of Stocks, 4:264
Taxes Generally, 1:64; 2:128; 11:685
Distributions, Corporate
In Liquidation, 1:64
Sources, 5:328
Dividends Paid Credit, 4:264, 10:616
Dividends, Preferential Distributions, 3:192
Doing Business, Foreign Corporations, 4:264

E

Employees, Social Security Act, 10:616
Employee's Trusts, 5:328
Exclusions from Gross Income, 3:192; 6:384
Exemptions
American Red Cross, 4:264
Business League, 6:384
Foreign Consul, Compensation, 12:746
Corporations, 11:685
Fraternal Beneficiary Societies, 6:384
Head of Family, 6:384
Nurses' Association, 3:192
Proof, 6:384
Religious, Charitable, etc., Corporations, 2:128
River Improvement Organization, 8:504
Social Clubs, 3:192; 10:616

F

Fiduciary Returns, 4:264
Foreign Corporations, 8:504
Doing Business, 4:264

G

Gain or Loss
Individual, 10:616; 12:746
Installment Obligations, 9:560
Gross Income
Compensation for Personal Services, 6:384
Exclusions, 8:504; 10:616
Inclusions, 4:264; 8:504; 10:616; 12:746

H

Head of Family, Personal Exemption, 2:128
Hurricane Losses, Deductibility, 7:448

I

Individual Returns, 1:64; 4:264
Information by Corporations, Contemplated Dissolution or Liquidation, 4:264
Installment Obligations, Gain or Loss, 9:560
Insurance Companies, Double Domicile, 8:504

L

Loans under AAA, Treatment, 7:448

M

Mexican Taxes, Credit Disallowed, 9:560

N

Net Income, Estates and Trusts, 6:384
Nonresident Aliens, 1:64

P

Payroll Taxes, Deductibility, 7:448
Personal Holding Companies, Surtax, 9:560

R

Railroad, Loss of Useful Value, 7:448
Revocable Trusts, 1:64

S

Stock
Transfers, Taxability, 12:746
Wash Sales, 12:746
Subcontract, the Vinson Act, 1:64

T

Taxes of Foreign Countries
Deductibility, 7:448; 9:560; 12:746
Fondo Obrero, 3:192
Telegraph and Telephone Facilities, Leased Wire Services, 12:746

V

Vinson Act, The, 1:64; 7:448

W

Withholding Tax at Source, 6:384; 7:448; 9:560
Exemption, 6:384